

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS**

Ebony Curley

(b) County of Residence of First Listed Plaintiff Wayne  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Romano Law, PLLC, Daniel Romano (P 49117) 26555 Evergreen Road, Ste. 1500  
Southfield, MI. 48076 (248)750-0270

**DEFENDANTS**

Detroit Public Schools Officer Ronald Hendon and Detroit Public School Officer  
Jon-Paul Kraft-Golz

County of Residence of First Listed Defendant Wayne  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE  
LAND INVOLVED.

Attorneys (If Known)

Theophilus E. Clemmons (P 47991) Detroit Public Schools Office Of The General  
Counsel, 3011 W. Grand Blvd. Ste. 1000, Detroit, MI. 48202 (313) 873-4527

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   |                                       |                                       |   |                            |                            |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
|   | PTF                                   | DEF                                   |   | PTF                        | DEF                        |
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input type="checkbox"/> 2            | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FOREFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input checked="" type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609

**V. ORIGIN**

(Place an "X" in One Box Only)

- ☐ 1 Original Proceeding ☒ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
42 USC 1983

Brief description of cause:  
Excessive Force and Illegal Search and Seizure in violation of 4th Amendment.

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ 25,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

GERSHWIN A. DRAIN  
WAYNE CIRCUIT COURT

DOCKET NUMBER

11-013665 NO

DATE

February 29, 2012

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

1. Is this a case that has been previously dismissed?

☐ Yes

☒ No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

☐ Yes

☒ No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

Notes :

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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

EBONY CURLEY

Plaintiff,

USDC No. *12-10915*

Wayne Circuit Court No.  
11- 013665-NO

vs

DETROIT PUBLIC SCHOOL OFFICER  
RONALD HENDON and,  
DETROIT PUBLIC SCHOOL OFFICER  
JON-PAUL KRAFT-GOLZ,

Defendants.

**ROMANO LAW P.L.L.C**  
**DANIEL G. ROMANO (P49117)**  
**GORDANA MISOVSKI (P 66381)**  
Attorneys for Plaintiffs  
26555 Evergreen Road, Ste. 1500  
Southfield, MI. 48076  
(248) 750-0270  
(248) 936-2105 (facsimile)

**THEOPHILUS E. CLEMONS (P47991)**  
**ASSISTANT GENERAL COUNSEL**  
**DETROIT PUBLIC SCHOOLS**  
Office of the General Counsel  
Attorney for Defendant Hendon and  
Kraft-Golz  
3011 W. Grand Blvd., Ste. 1000  
Detroit, MI. 48202  
(313) 873-4527  
(313) 873-4564 (facsimile)  
theophilus.clemons@detroitk12.org

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**DEFENDANTS RONALD HENDON & JON-PAUL KRAFT-GOLZ'S**  
**JOINT NOTICE OF REMOVAL**

NOW COMES Defendants Ronald Hendon & Jon-Paul Kraft-Golz, by and through their undersigned counsel, and hereby give notice of removal of the above-captioned action to the United States District Court for the Eastern District of Michigan, and in support state as follows:

1. A civil action has been commenced and is now pending in the Wayne County Circuit Court, Case No, 11-013665 NO, wherein EBONY CURLEY is the Plaintiff and DETROIT PUBLIC SCHOOL OFFICER RONALD HENDON and DETROIT PUBLIC SCHOOL OFFICER JON-PAUL KRAFT-GOLZ are named as Defendants.

2. The above described action is a civil action of which the United States District Courts have original jurisdiction in that Plaintiff claims damages arising from Defendant's alleged violation of the Fourth and Fourteenth Amendments to the United States Constitution. This Court has original jurisdiction of claims arising under the Constitution or laws of the United States pursuant to 28 USC § 1331.

3. Plaintiff also brings state law claims which arise out of the same transaction or occurrence as their United States Constitution claims. Plaintiff's state law claims are so related to his United States Constitution claims that they form part of the same case or controversy and are, therefore, within the supplemental jurisdiction of this Court pursuant to 28 USC § 1367.

4. Removal jurisdiction exists pursuant to 28 USC §§ 1331 and 1441 (a) and (b).

5. This Notice of Removal is timely filed pursuant to 23 USC § 1446 (b) because it is filed within 30 days after receipt on February 1, 2012, by the undersigned attorney through proper service, of a copy of Plaintiff's Complaint And Jury Demand in this matter.

6. Each named Defendant herein consents to and joins in the removal of this action by each other, and any and all other Defendants.

7. Pursuant to 28 USC §1446(d), both Defendants have provided written notice of the filing of this Notice Of Removal to Plaintiffs' counsel and has filed a copy of this Notice Of Removal with the Clerk of the Wayne County Circuit Court, State of Michigan.

8. A copy of Plaintiff's Summons, and Complaint And Jury Demand on each Defendant, which are the only properly served pleadings upon the Defendants through counsel, are attached hereto as Exhibit 1.

WHEREFORE DETROIT PUBLIC SCHOOL POLICE OFFICER RONALD HENDON and DETROIT PUBLIC SCHOOL POLICE OFFICER JON-PAUL KRAFT-GOLZ gives notice that this action is removed from Wayne County Circuit Court to this UNITED STATES DISTRICT COURT.

Respectfully submitted,

s/Theophilus E. Clemons  
THEOPHILUS E. CLEMONS (P 47991)  
Assistant General Counsel  
Detroit Public Schools  
Office of the General Counsel  
3011 West Grand Blvd., Ste. 1800  
Detroit, MI. 48202  
(313)873-4527  
[theophilus.clemons@detroitk12.org](mailto:theophilus.clemons@detroitk12.org)

February 29, 2012

CERTIFICATE OF SERVICE

The undersigned certifies that on February 29, 2012, he served a copy of DETROIT PUBLIC SCHOOL OFFICER RONALD HENDON and DETROIT PUBLIC SCHOOL OFFICER JON-PAUL KRAFT-GOLZ Joint Notice of Removal, Civil Cover Sheet and this Certificate of Service upon all counsel of record, via ECF system and U.S. Mail First Class.

s/Theophilus E. Clemons  
THEOPHILUS E. CLEMONS (P 47991)  
Detroit Public Schools  
Office of the General Counsel  
3011 West Grand Blvd., Ste. 1000  
Detroit, MI. 48202  
(313)873-4527  
[theophilus.clemons@detroitk12.org](mailto:theophilus.clemons@detroitk12.org)

February 29, 2012



**SUMMONS AND  
RETURN OF SERVICE**



11-013665-NO

COURT  
ADDRESS: 2 WOODWARD AVENUE, DETROIT, MICHIGAN 48226

COURT  
TELEPHONE NO. (313) 224-

THIS CASE ASSIGNED TO JUDGE: **Gershwin A. Drain**

Bar Number: 12937

PLAINTIFF  
**CURLEY, EBONY**

VS

DEFENDANT  
**KRAFT GOLZ, JON PAUL**

PLAINTIFF'S ATTORNEY

**Romano, Daniel G.**  
(P-49117)  
26555 Evergreen Rd Ste 1500  
Southfield, MI 48076-4257  
(248) 750-0270

**RECEIVED**

FEB 01 2012

OFFICE OF  
THE GENERAL COUNSEL

CASE FILING		FEE	
Paid		Paid	
11/03/2011	02/02/2012	Sterling Harrison	
*This summons is invalid unless served on or before its expiration date.		Cathy M. Garrett - Wayne County Clerk	

**NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
  2. YOU HAVE 21 DAYS after receiving this summons to file an answer with the court and serve a copy on the other party or to take other lawful action (28 days if you were served by mail or you were served outside this state).
  3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
- ☐ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☒ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in \_\_\_\_\_ Court.
- ☐ There is no other pending or resolved action within the jurisdiction of the family division of circuit court involving the family or family members of the parties.
- ☐ An action within the jurisdiction of the family division of the circuit court involving the family or family members of the parties has been previously filed in \_\_\_\_\_ Court.

The docket number and assigned judge of the civil/domestic relations action are:

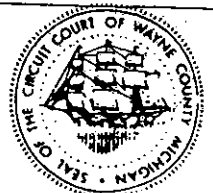
Docket no.	Judge	Bar no.

The action ☐ remains ☐ is no longer pending.

declare that the complaint information above and attached is true to the best of my information, knowledge, and belief.

ate 2/1/12

Daniel G. Romano



**COMPLAINT IS STATED ON ATTACHED PAGES. EXHIBITS ARE ATTACHED IF REQUIRED BY COURT RULE.**  
you require special accommodations to use the court because of disabilities, please contact the court immediately to make arrangement.

JURY FEE PAID

DATE:

11/3/11

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

EBONY CURLEY

Plaintiff,

Case No. 11-  
Hon.

NO

vs.

DETROIT PUBLIC SCHOOL POLICE OFFICER  
RONALD HENDON and  
DETROIT PUBLIC SCHOOL POLICE OFFICER JON-PAUL  
KRAFT-GOLZ

Defendants.

ROMANO LAW, P.L.L.C.  
BY: DANIEL G. ROMANO (P49117)  
GORDANA MISOVSKI (P66381)  
Attorney for Plaintiff  
26555 Evergreen Road, Suite 1500  
Southfield, Michigan 48075  
248-750-0270 / fax 248-936-2105

RECEIVED  
CATHY M. GARNETT  
WAYNE COUNTY CLERK  
2011 NOV -3 PM 4:26

There is no other pending or resolved civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint.

**COMPLAINT & DEMAND FOR JURY TRIAL**

NOW COMES Plaintiff, EBONY CURLEY, by and through her attorneys, ROMANO LAW, PLLC, and complaining against the above-named Defendants, states as follows:



**COMMON ALLEGATIONS**

1. That Plaintiff is a resident of the County of Wayne, State of Michigan.
2. Defendants are Detroit Public School police officers in the employ of the Detroit Public Schools, who at all relevant times were acting under color and scope of the authority vested in them
3. That June 7, 2010, Plaintiff EBONY CURLEY received a telephone call from the Clara Rutherford Academy in the City of Detroit advising her that her son had been suspended and she needed to pick him up.
4. Upon arrival at the school, Plaintiff demanded to know why her son was being suspended but nobody would give her any information.
5. Plaintiff left the school and returned with her mother and son in an attempt to find out any information regarding her son's suspension.
6. When Plaintiff returned to the school she was were taken to an office with an administrator and began to discuss the suspension.
7. After resolving the matter and as Plaintiff prepared to leave, she was intercepted by the two Defendant Police Officers who told her that she was not allowed on school property. Plaintiff informed the officers that her two children were students and that was her purpose for being at the school.
8. Defendants told Plaintiff that she was under arrest for being on school grounds, when she asked for an explanation, Defendants puller her, forcefully grabbed her by the wrist, manhandled and pushed her so aggressively that she fell into an adjoining room losing her purse and personal belongings in the process.

9. Defendants used such unreasonable and excessive force against Plaintiff that they succeeded in fracturing her wrist.

10. Plaintiff was taken to jail and charged with disorderly conduct, which charge was eventually dismissed.

11. That Defendants were belligerent, unreasonable and malicious in dealing with the Plaintiff.

12. That the amount in controversy exceeds Twenty-Five Thousand Dollars or is otherwise within the jurisdiction of this court.

13. That Plaintiff has treated with a litany of Medical Professionals for her physical and mental injuries.

**COUNT I**  
**SECTION 1983 AGAINST INDIVIDUALS**

14. Plaintiff incorporates each of the Common Allegations as though fully stated herein.

15. That 42 USC Section 1983 provides for civil liability for deprivation of any right, privileges and immunities carried by the constitution and laws of the United States and the State of Michigan.

16. That at all times material herein, Defendants were acting under color of law.

17. That at all times material herein, said Defendants subjected Plaintiff to deprivation of her rights, privileges and immunity secured by the Constitution of the United States and, more specifically, Amendments 4 and 14 of the laws of the United States and the State of Michigan.

18. That the above referred to customs and practices implemented by Defendants proximately caused the injuries and losses to Plaintiff as alleged herein thereby depriving Plaintiff of rights, privileges and immunities secured by the Constitution and its Amendments.

**WHEREFORE**, Plaintiff demands judgment against Defendants in whatever amount the Plaintiff is entitled together with exemplary and punitive damages, plus interest, costs, and attorney fees.

**COUNT II**  
**ASSAULT AND BATTERY**

19. Plaintiff incorporates each of the common allegations contained herein.

20. That Defendants did assault and batter Plaintiff.

21. That Defendants used unnecessary force in detaining Plaintiff and placing her in handcuffs.

**WHEREFORE**, Plaintiff demands judgment against Defendant in whatever amount the Plaintiff is entitled together with exemplary and punitive damages, plus interest, costs, and attorney fees.

**COUNT III**  
**MALICIOUS PROSECUTION**

22. That Plaintiff incorporates each of the General Allegations contained herein

23. That Defendant maliciously caused or procured Plaintiff to be arrested, attached, or in any way proceeded against, by process or civil or criminal action, or in any other manner prescribed by law, to answer to the suit or prosecution.

**WHEREFORE**, Plaintiff demands judgment in his favor and against the Defendant in whatever amount Plaintiff is found to be entitled together with costs, interest, and attorney fees.

ROMANO LAW, P.L.L.C.

BY: 

DANIEL G. ROMANO (P49117)  
GORDANA MISOVSKI (P66381)  
Attorney for Plaintiff  
26555 Evergreen Road, Suite 1500  
Southfield, Michigan 48075  
248-750-0270 / fax 248-936-2105

November 3, 2011

**DEMAND FOR JURY TRIAL**

**NOW COMES** the above-named Plaintiff, by and through his attorneys, ROMANO LAW, P.L.L.C., and hereby makes formal demand for a trial by jury of the facts and issues involved in this cause of action.

Respectfully submitted,

ROMANO LAW, P.L.L.C.

BY: 

DANIEL G. ROMANO (P49117)  
GORDANA MISOVSKI (P66381)  
Attorney for Plaintiff  
26555 Evergreen Road, Suite 1500  
Southfield, Michigan 48075  
248-750-0270 / fax 248-936-2105

Dated November 13, 2011

**SUMMONS AND  
RETURN OF SERVICE**

11-013665-NO

COURT  
ADDRESS: 2 WOODWARD AVENUE, DETROIT, MICHIGAN 48226COURT  
TELEPHONE NO. (313) 224-THIS CASE ASSIGNED TO JUDGE: **Gershwin A. Drain****Bar Number: 12937**

PLAINTIFF

DEFENDANT

**CURLEY, EBONY****VS****HENDON, RONALD**

PLAINTIFF'S ATTORNEY

**Romano, Daniel G.**  
**(P-49117)****26555 Evergreen Rd Ste 1500**  
**Southfield, MI 48076-4257**  
**(248) 750-0270****RECEIVED****FEB 01 2012**OFFICE OF  
THE GENERAL COUNSEL

CASE FILING FEE		JURY FEE	
Paid		Paid	
ISSUED		RETURN TO COUNTY CLERK	
11/03/2011		02/02/2012	
Sterling Harrison		Sterling Harrison	

\*This summons is invalid unless served on or before its expiration date.

Cathy M. Garrett - Wayne County Clerk

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The docket number and assigned judge of the civil/domestic relations action are:

Docket no.	Judge	Bar no.

The action ☐ remains ☐ is no longer pending.

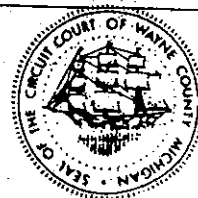
I declare that the complaint information above and attached is true to the best of my information, knowledge, and belief.

Date

2/1/12

Signature of attorney/plaintiff

Daniel G. Romano

**COMPLAINT IS STATED ON ATTACHED PAGES. EXHIBITS ARE ATTACHED IF REQUIRED BY COURT RULE.**

If you require special accommodations to use the court because of disabilities, please contact the court immediately to make arrangement.

JURY FEE PAID  
THIS DATE:

BY: 11/3/11

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

EBONY CURLEY

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vs.

Case No. 11- NO  
Hon.

DETROIT PUBLIC SCHOOL POLICE OFFICER  
RONALD HENDON and  
DETROIT PUBLIC SCHOOL POLICE OFFICER JON-PAUL  
KRAFT-GOLZ

Defendants.

ROMANO LAW, P.L.L.C.  
BY: DANIEL G. ROMANO (P49117)  
GORDANA MISOVSKI (P66381)  
Attorney for Plaintiff  
26555 Evergreen Road, Suite 1500  
Southfield, Michigan 48075  
248-750-0270 / fax 248-936-2105

RECEIVED  
CATHY M. ARRETT  
WAYNE COUNTY CLERK  
2011 NOV -3 P 4:26

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17. That at all times material herein, said Defendants subjected Plaintiff to deprivation of her rights, privileges and immunity secured by the Constitution of the United States and, more specifically, Amendments 4 and 14 of the laws of the United States and the State of Michigan.



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**COUNT III**  
**MALICIOUS PROSECUTION**

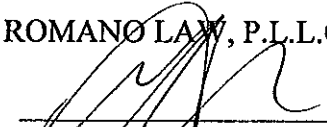
22. That Plaintiff incorporates each of the General Allegations contained herein

23. That Defendant maliciously caused or procured Plaintiff to be arrested, attached, or in any way proceeded against, by process or civil or criminal action, or in any other manner prescribed by law, to answer to the suit or prosecution.

**WHEREFORE**, Plaintiff demands judgment in his favor and against the Defendant in whatever amount Plaintiff is found to be entitled together with costs, interest, and attorney fees.

ROMANO LAW, P.L.L.C.

BY:

  
DANIEL G. ROMANO (P49117)  
GORDANA MISOVSKI (P66381)  
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November 3, 2011

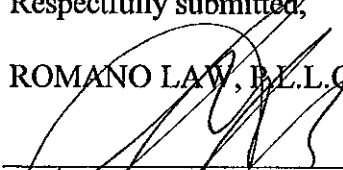
**DEMAND FOR JURY TRIAL**

**NOW COMES** the above-named Plaintiff, by and through his attorneys, ROMANO LAW, P.L.L.C., and hereby makes formal demand for a trial by jury of the facts and issues involved in this cause of action.

Respectfully submitted,

ROMANO LAW, P.L.L.C.

BY:

  
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Dated November 13, 2011